

1 4. I have reviewed the Complaint filed in *Visual Supply Company v. Adam*
2 *Khimji, et al.* (N.D. Cal. Case No. 3:24-cv-9361-WHO).

3 5. On or about October 4, 2024, I received an email at my work email
4 address at Adam.Khimji@ISED-ISDE.GC.CA, enclosing a cease-and-desist
5 letter from Visual Supply Company. Attached to this Declaration and marked as
6 **Exhibit “A.”** is a copy of that cease-and-desist letter. With respect to this cease-
7 and-desist letter:

8 a. The Prince of Wales Dr. address is my residential address,
9 although the unit number of my apartment is missing.

10 b. The Queen St. address is my work address.

11 c. The vscoclub@protonmail.com address is **not** my email address.

12
13 6. The receipt of the aforementioned cease-and-desist letter was the first
14 time I heard about Visual Supply Company (“**VSCO**”) and its website and
15 applications. I have never used VSCO’s website or applications in any way, and
16 have never created any account with VSCO.

17 7. Upon receipt of the cease-and-desist letter and recognizing the
18 seriousness of the allegations, I retained Mr. Jonathan Kleiman to respond on my
19 behalf. Mr. Kleiman is a lawyer called to the bar in Ontario, Canada and not an
20 attorney called to the bar in California.

21 8. Attached to this Declaration and marked as **Exhibit “B.”** is a copy of the
22 letter in response that Mr. Kleiman sent on my behalf on October 9, 2024.

23
24 9. Attached to this Declaration and marked as **Exhibit “C.”** is a copy of the
25 email that Visual Supply Company’s counsel sent to Mr. Kleiman on October 11,
26 2024, enclosing three files that contact my contact information that Visual Supply
27 Company’s counsel claims were obtained from Cloudflare pursuant to a
28 subpoena. Visual Supply Company’s counsel did not provide Mr. Kleiman with a
copy of the subpoena or the court application that was filed to obtain the

1 subpoena. I understand Mr. Kleiman did not investigate into whether Visual
2 Supply Company properly obtained their subpoena. I understand that Mr.
3 Kleiman also did not look into the WIPO domain name resolution proceedings
4 referred to in paragraphs 37-38 of the Complaint in *Visual Supply Company v.*
5 *Adam Khimji, et al.* (N.D. Cal. Case No. 3:24-cv-9361-WHO)

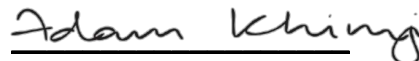
6 10. For greater certainty, I am attaching the email in **Exhibit C** that Mr.
7 Kleiman forwarded to me solely to illustrate that Visual Supply Company has
8 utilized the subpoena that this Court had issued. Nothing in this Declaration
9 should be construed as a waiver of attorney-client privilege or litigation privilege.

10 11. Up to around end of December 2024, Mr. Kleiman was unsuccessful in
11 convincing Visual Supply Company that I am in no way involved with the
12 allegations they made in the cease-and-desist letter. I do not have a technology
13 background to be capable of what Visual Supply Company is alleging. I believe
14 my personal information was obtained by an unknown third-party without my
15 consent and used without my knowledge for the alleged activities. I have no
16 information on who may have obtained my personal information and used it.

17 12. After Visual Supply Company filed the Complaint in *Visual Supply*
18 *Company v. Adam Khimji, et al.* (N.D. Cal. Case No. 3:24-cv-9361-WHO), I have
19 promptly signed the waiver of summons. Thereafter, I began searching for a
20 California lawyer that could assist me. Eventually, I retained Mr. Simon Lin, who
21 is called to the bars of California, British Columbia, and Ontario, to represent me.

22 I declare under penalty of perjury under the laws of the State of California that
23 the foregoing is true and correct.

24 Executed on March 20, 2025 in the City of Ottawa, Province of Ontario, Canada.

25 

26 Adam Khimji
27
28

EXHIBIT A



One Embarcadero Center, Twenty-Second Floor
San Francisco, California 94111-3711
Telephone: (415) 392-1960
Facsimile: (415) 392-0827

Zachary J. Alinder
zalinder@sideman.com

October 4, 2024

VIA EMAIL AND FEDEX EXPRESS

Adam Khimji
1435 Prince of Wales Dr.
Ottawa, ON K2C 1N5
Canada

Adam Khimji
235 Queen St.
Ottawa, ON K1A 0H5
Canada

Emails: Adam.Khimji@ISED-ISDE.GC.CA; vscoclub@protonmail.com

Re: Cease and Desist re VSCO IP Infringements and Demand For Compliance

Dear Mr. Khimji,

We represent Visual Supply Company (“VSCO”) in relation to certain legal matters. Our investigation has established that you are the creator and operator of several websites that infringe and trespass on VSCO’s intellectual property and invade the privacy of and otherwise harm VSCO’s users. In doing so, you have violated VSCO’s terms of service, and used technological means to circumvent VSCO’s access controls to scrape, download, and aggregate images of women and girls—including images of minors—for distribution to others, which you monetized through various websites and at least one associated Patreon account. These unlawful and infringing websites include at least <vsco.club> and <glizzy.cafe> (collectively, the “Infringing Websites”).

To be clear, this conduct is illegal, and VSCO demands that YOU immediately and forever cease and desist from any further illegal conduct in relation to VSCO or its users. VSCO further demands that you cooperate in its investigation and that you compensate VSCO for the harm that you have caused, including but not limited to its investigative and legal expenses. This letter represents a one-time opportunity to resolve this dispute and avoid publicly-filed U.S. Federal Court litigation. If you are represented by counsel in connection with this matter, please provide this letter to your counsel and have them respond immediately.

The VSCO IP.

VSCO owns numerous U.S. federal trademark registrations for its famous VSCO word mark and logo, including U.S. Trademark Reg. Nos. 4,672,062; 4,273,434; and 4,716,756. VSCO similarly owns numerous Canadian and international trademark registrations for these marks, including Canada Trademark Reg. Nos. TMA1001520 and TMA861556, and International Trademark Reg. No. 1661739. VSCO further owns

Adam Khimji
October 4, 2024
Page 2

substantial common law trademark rights covering use of its famous VSCO word mark and logo on a variety of products and services beyond those identified in its extensive and global trademark portfolio.

The copyright-protected images depicted on the VSCO website are the intellectual property of individual VSCO creators. Pursuant to VSCO's Terms of Use,¹ VSCO creators grant VSCO and its agents the right to pursue infringement claims under the Copyright Act and Digital Millennium Copyright Act for unauthorized reproductions of VSCO creators' photographs.

In addition, the names, photographs, and likenesses of individual VSCO creators are protected by those creators' rights of publicity. Pursuant to VSCO's Terms of Use, VSCO creators also grant VSCO and its agents the right to pursue infringement claims for violations of their rights of publicity through unlawful commercialization of their photographs and likenesses.

Your Unlawful Activities Using The VSCO IP.

Our investigation has revealed that you, under the aliases "Aidan Salamon" and "Mike Hunt," registered several domains including at least <vsco.club> and <glizzy.cafe>, and created the Infringing Websites. On the Infringing Websites, you used VSCO's famous VSCO word mark and logo, and posted erotic photographs of young women and girls, including images of minors, that you copied and downloaded through unauthorized access to VSCO's websites and creator profiles. An example of the content you posted on the Infringing Websites is attached hereto as **Exhibit A**.

You infringed upon VSCO's trademark rights by using the VSCO trademark in a manner that created a substantial likelihood that consumers will be confused into believing that you and/or the Infringing Websites are affiliated with, sponsored or endorsed by VSCO, and/or are otherwise related to VSCO, when no such relationship exists. This likelihood of confusion is exacerbated by your incorporation of the VSCO trademark into the domain name of the Infringing Websites, such as vsco.club. Unauthorized use of VSCO's trademarks in this way violates VSCO's rights under the Lanham Act, consumer protections statutes, and the common law.

Moreover, the Infringing Websites targeted VSCO users, specifically, young women and girls, and used illegal tactics to steal those VSCO users' copyright-protected images (the "Protected Images"). According to our investigation, you accessed VSCO's website (<https://www.vSCO.co/>) without authorization and using technological measures to circumvent certain access protections VSCO has put in place to protect its user's content and images. Your knowing and unlawful distribution and display of the Protected Images was unauthorized and constitutes copyright infringement. Moreover, the Infringing Websites permitted their users to download and save local copies of the Protected Images, thereby

¹ See <https://www.vSCO.co/about/terms-of-use>.

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Page 3

facilitating unauthorized access to downloadable digital copies of the Protected Images in violation of at least the anti-trafficking provisions of the Digital Millennium Copyright Act.

In addition, to monetize the Infringing Websites and the copyrighted photographs displayed thereon, you created a Patreon account at <https://www.patreon.com/vscoclub>, whereby you sought to collect payment for access to these young women and girls' deleted content and advertised that you "have 10+ million accounts saved." A printout of this Patreon account is attached hereto as **Exhibit B**. You also solicited additional payments from internet users on the Infringing Websites themselves and on Reddit; an example of your solicitations of payment on the Infringing Websites and on Reddit is attached hereto as **Exhibit C**. Commercialization of these young women and girls' photographs without their consent violates their rights of publicity under U.S. state law, *e.g.*, Cal. Civ. Code § 3344.

Finally, your use of VSCO's websites, mobile apps, products, and services binds you to VSCO's Terms of Use, and your unlawful conduct involving the Infringing Websites described above constitutes a breach of those Terms of Use, trespass, interference, and unfair competition under California state law as well. Pursuant to VSCO's Terms of Use, your use of VSCO's websites, mobile apps, products, and services to create the Infringing Websites subjects you to the jurisdiction of the courts located in San Francisco, California, for litigation arising from the unlawful conduct discussed above.

All of the legal transgressions described herein carry civil penalties, including statutory damages, compensatory damages, enhanced damages for willful infringement, injunctive relief, attorneys' fees, and costs. VSCO will not hesitate to seek the maximum penalties against you in the public forum of U.S. federal court to remedy your violations of VSCO and its users' rights. Given your unauthorized access of the accounts of young women and minor girls to hack, scrape, copy, download, and distribute their intimate photographs without their consent for your own material gain, and lurid characterizations of them on forums like "VSCOs sluts," the likelihood of enhanced and/or punitive damages is high. Your conduct exploits real individuals with rights and dignity that must be respected, and that VSCO intends to protect with all available remedies. In short, **VSCO takes these matters very seriously and any failure to cooperate fully and comply with VSCO's demands will result in swift action.**

This letter shall serve as a cease and desist demand and cooperation offer that will remain open only until **October 14, 2024**. On or before that date, please confirm in writing to my attention that you agree to and will immediately cease and desist and comply as follows:

1. Cease and desist all access by any means to VSCO's services, including, but not limited to, VSCO's websites, mobile applications, creator profiles, and creator content;
2. Cease and desist any and all activity in relation to VSCO or its users in any way, including but not limited to ceasing and desisting from (i) any use of the VSCO

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trademarks and/or any other marks likely to cause confusion with the VSCO trademarks in connection with any website, web domains, mobile applications, advertisements, marketing materials, digital media, and/or social media, or (ii) any hacking, accessing, copying, downloading, or distributing any photos, content, or any other materials from VSCO or any VSCO creator or user; and,

3. Fully and forever delete and destroy any and all copies, in any format whatsoever, and wherever stored, of any photos, content, or other materials from VSCO or any VSCO creator or user, after providing one copy of all such materials to us for preservation purposes as described below.

In addition to VSCO's cease and desist and compliance demands above, VSCO requires your cooperation with its ongoing investigation and your payment of damages and costs, as follows, and requires your confirmation that you will comply with these demands by **October 12, 2024**. The demands include:

4. Identify with specificity any and all individuals and/or entities involved in any way with the creation, development, and/or operation of the Infringing Websites, as well as any similar or related websites, mobile applications, social media, and/or other online forums;
5. Identify with specificity all other websites, web domains, mobile applications, social media, and/or other online forums that provide services similar or related to those provided on the Infringing Websites, and provide all information that you have regarding the owners/operators of those other websites, domains, apps, social media, forums, or services, including but not limited to their full names, emails addresses, website names, user handles, residence addresses, phone numbers, and any other contact information you possess;
6. Provide a detailed and precise account of the technological methods and/or mechanisms you used to gain access to, hack, scrape, download, and/or distribute VSCO's websites, creator content, and/or photo data, including but not limited to in relation to the Infringing Websites;
7. Preserve all documents, records, and data, and communications related to this matter and/or the Infringing Websites, including, but not limited to, emails, text messages, call logs, photos, creator content, and/or any other materials, whether in physical or electronic form, including in all personal and professional devices and/or accounts.
8. Provide a full and complete copy of all documents/data set forth above in No. 7 for VSCO to use at its sole and complete discretion in its ongoing investigation of these matters.
9. Agree to compensate VSCO for its reasonable damages and costs incurred, in an amount to be agreed between the parties.

Adam Khimji
October 4, 2024
Page 5

As set forth above, VSCO requires a response agreeing its demands no later than **October 14, 2024**. Please respond to my email directly. Or if you are represented by legal counsel, please have them contact me no later than this deadline. VSCO reserves all rights and remedies in relation to these matters.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Zachary Alinder', with a stylized flourish at the end.

Zachary Alinder

11673-1\7414480

EXHIBIT A

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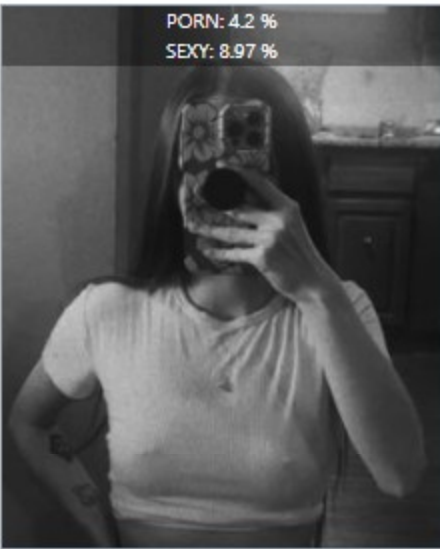
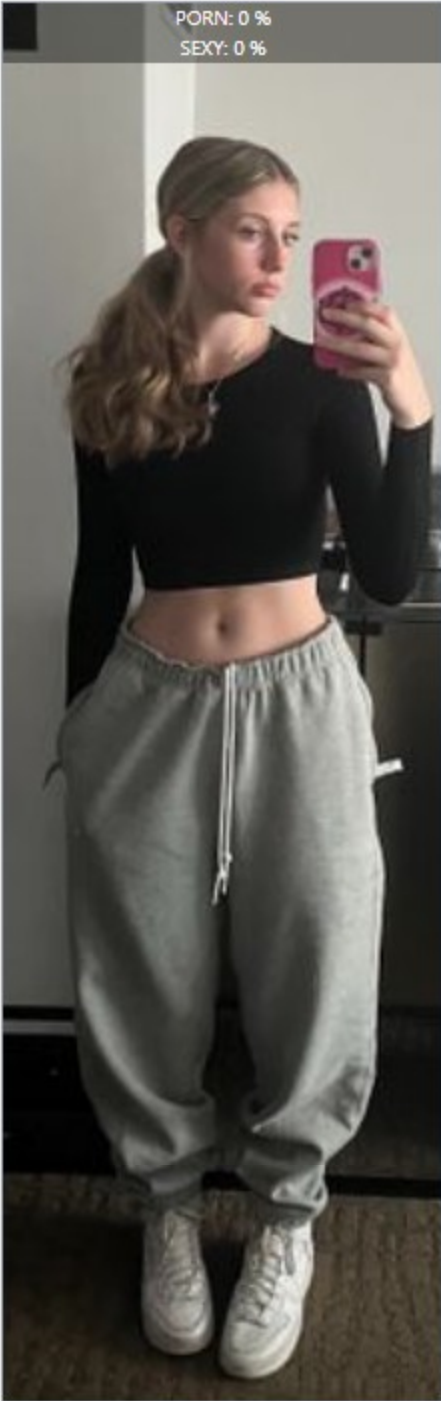
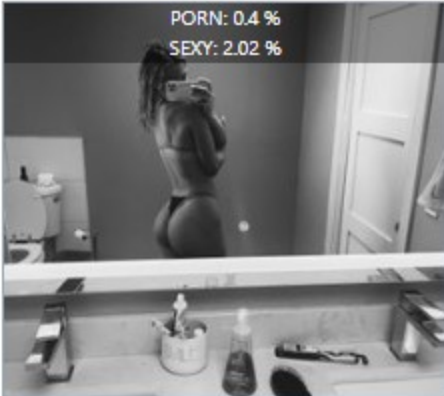
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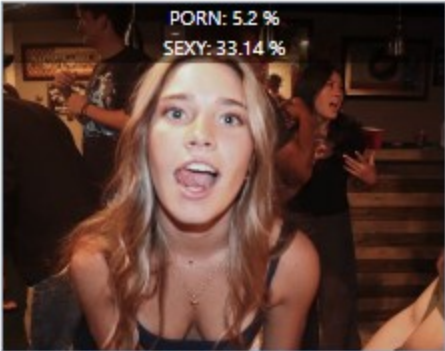
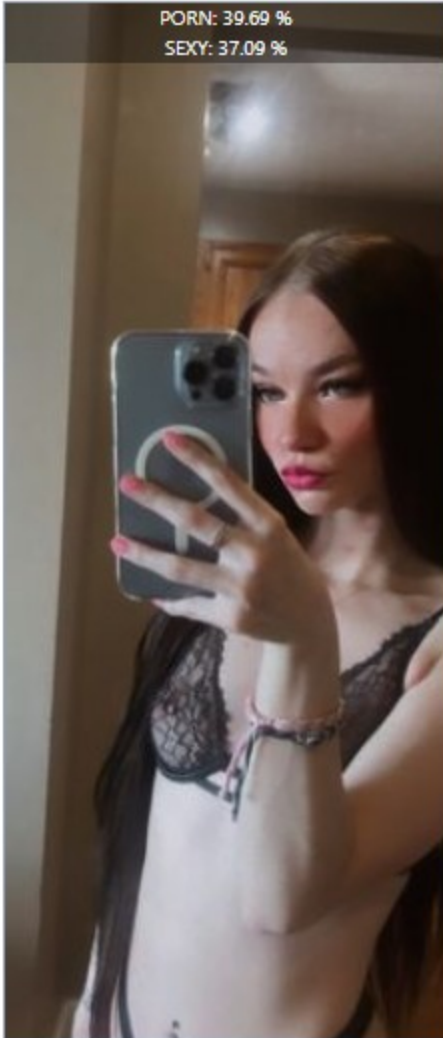
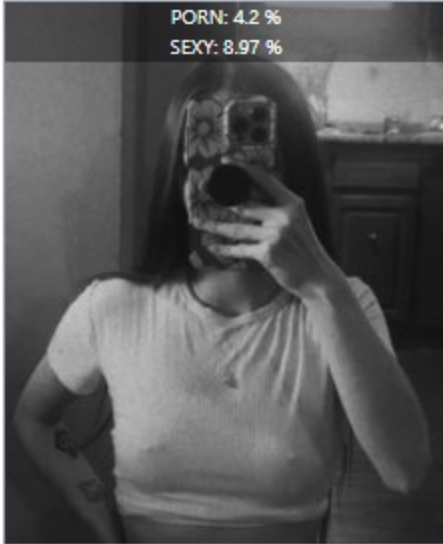
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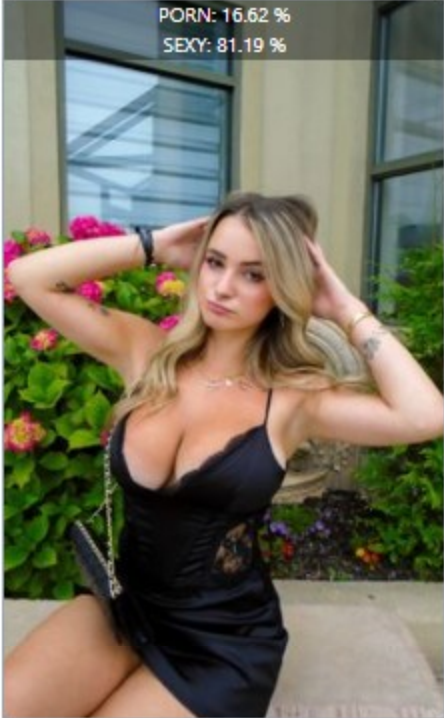
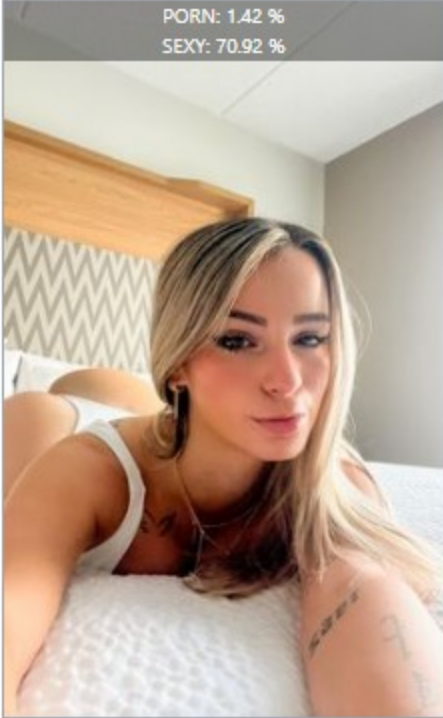
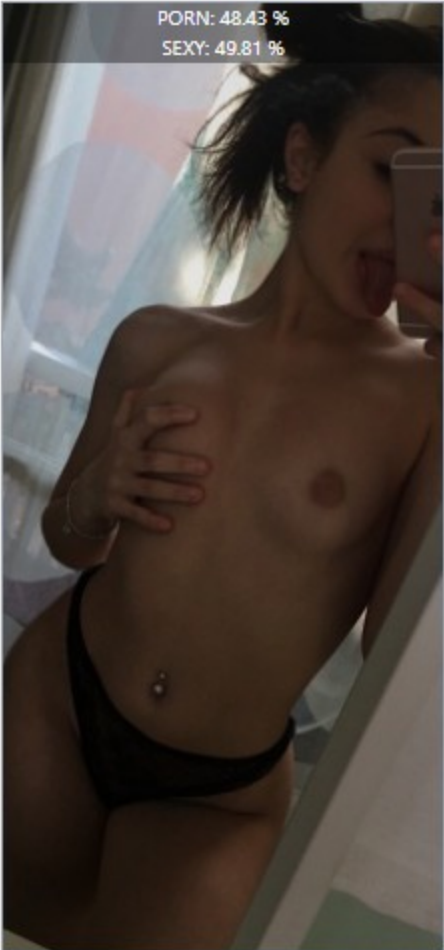
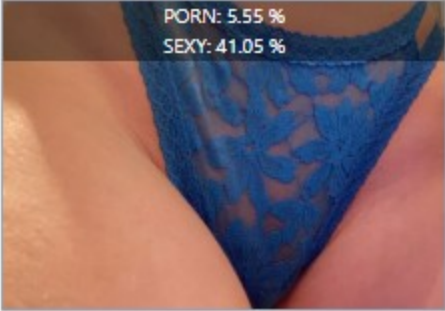
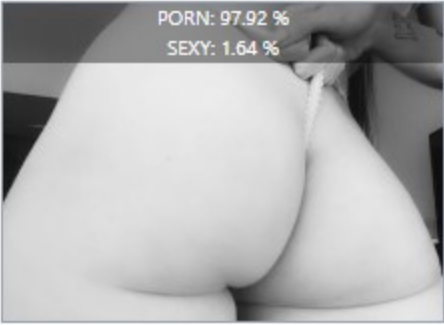
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EXHIBIT B

VSCO.CLUB



VSCOclub

217 posts
creating pictures and videos!

Become a patron

Choose your membership

Support the site!
\$10 / month

Join

This tier is just to support the site (no tangible benefits). I'll use this to pay for web hosting etc.

- General Support

View deleted users' pictures/videos
\$15 / month

Join

I will post a user every other day at a minimum, sometimes daily. You will get access to all the pictures and videos of people that deleted their account. This may not include ALL the pictures/videos they uploaded, but I will post what I have for them.

- General Support
- View deleted users pictures/videos

Request users
\$25 / month

Join

I will take requests from any user you want (about 10-20 accounts per month). I will send the entire account of the user...all photos and videos they uploaded *that I saved*. So that sometimes means deleted pictures/videos as well.

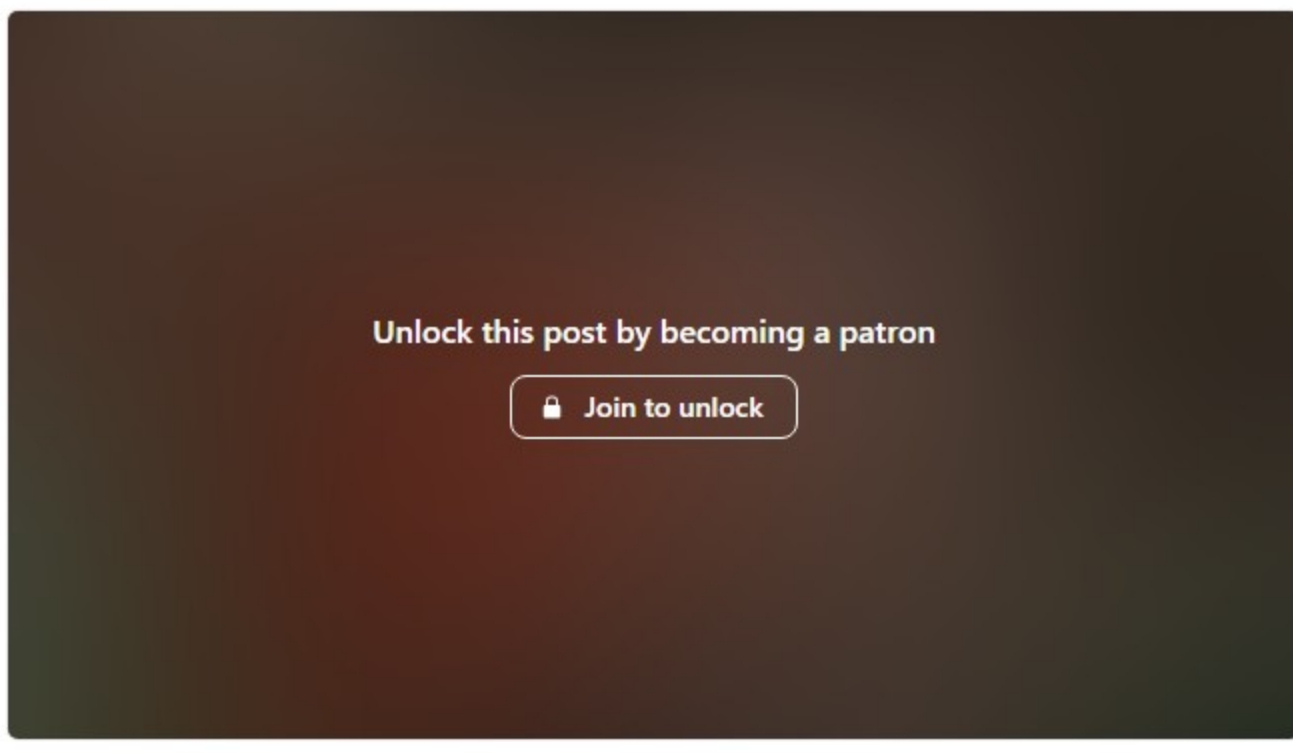
I have 10+ million accounts saved, so the odds are high I have what you're looking for.

- General Support
- View deleted users pictures/videos
- Request users

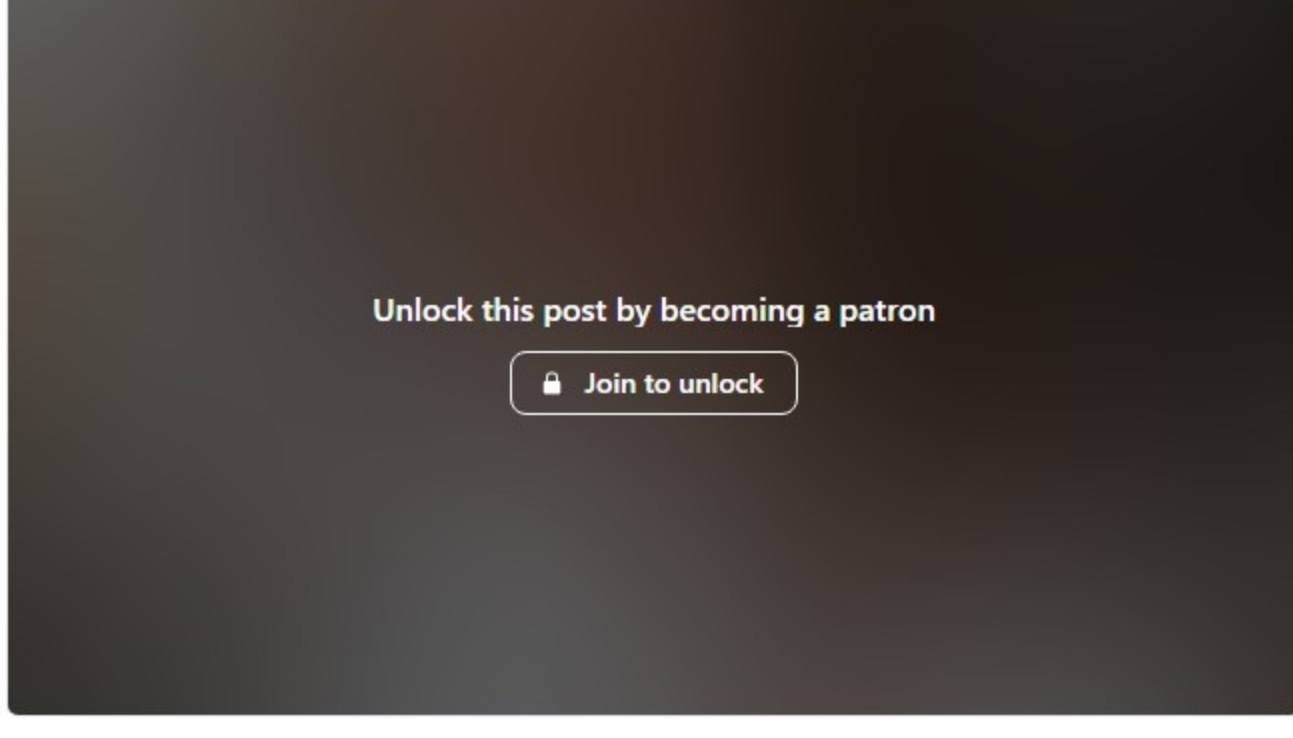
About VSCOclub

I am just a student doing this on my side, so I really would appreciate anything to help. I have many, many users saved from vscso so the 'request user' tier would help me pay for the site more, and in return I will post a couple users a week. The extra cost is just the time it will take me to actually find users in my catalog and actually post etc. Please check the tiers for more info of the options. Feel free to click 'custom pledge' below if you're feeling more generous, but please dont feel obligated :)

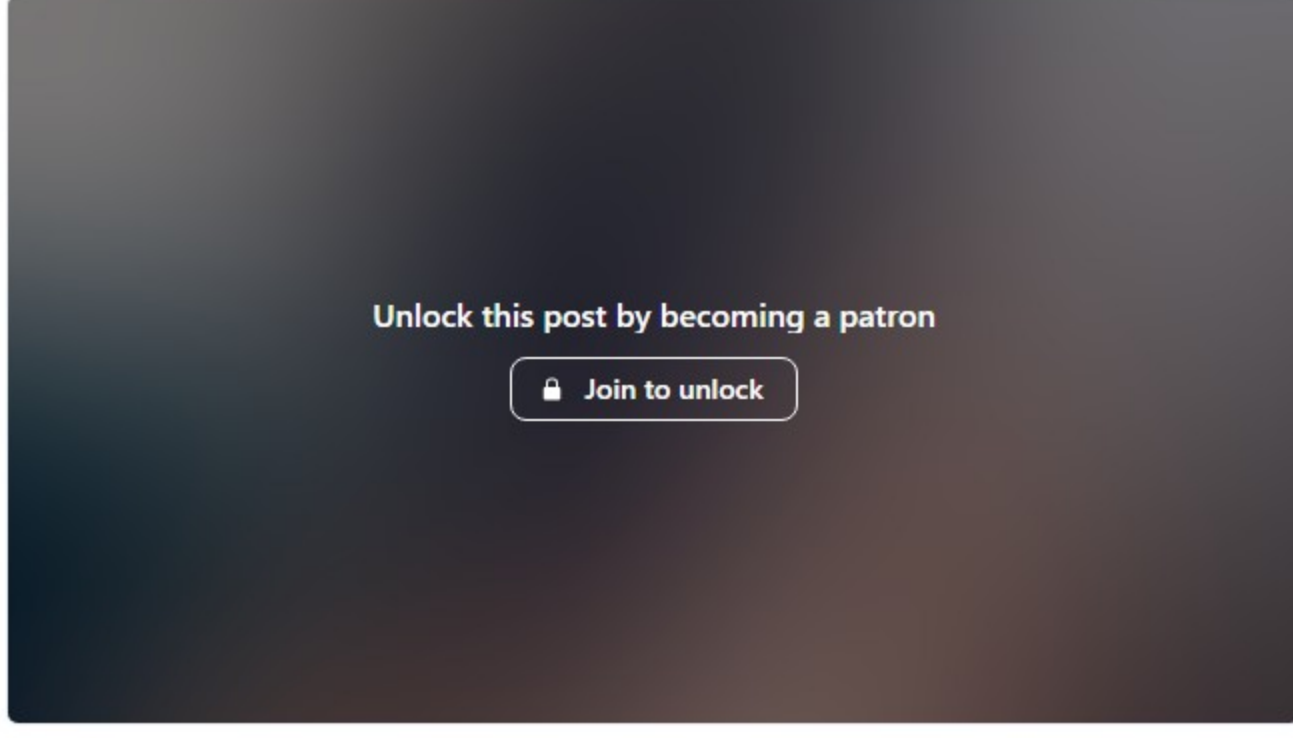
Recent posts by VSCOclub



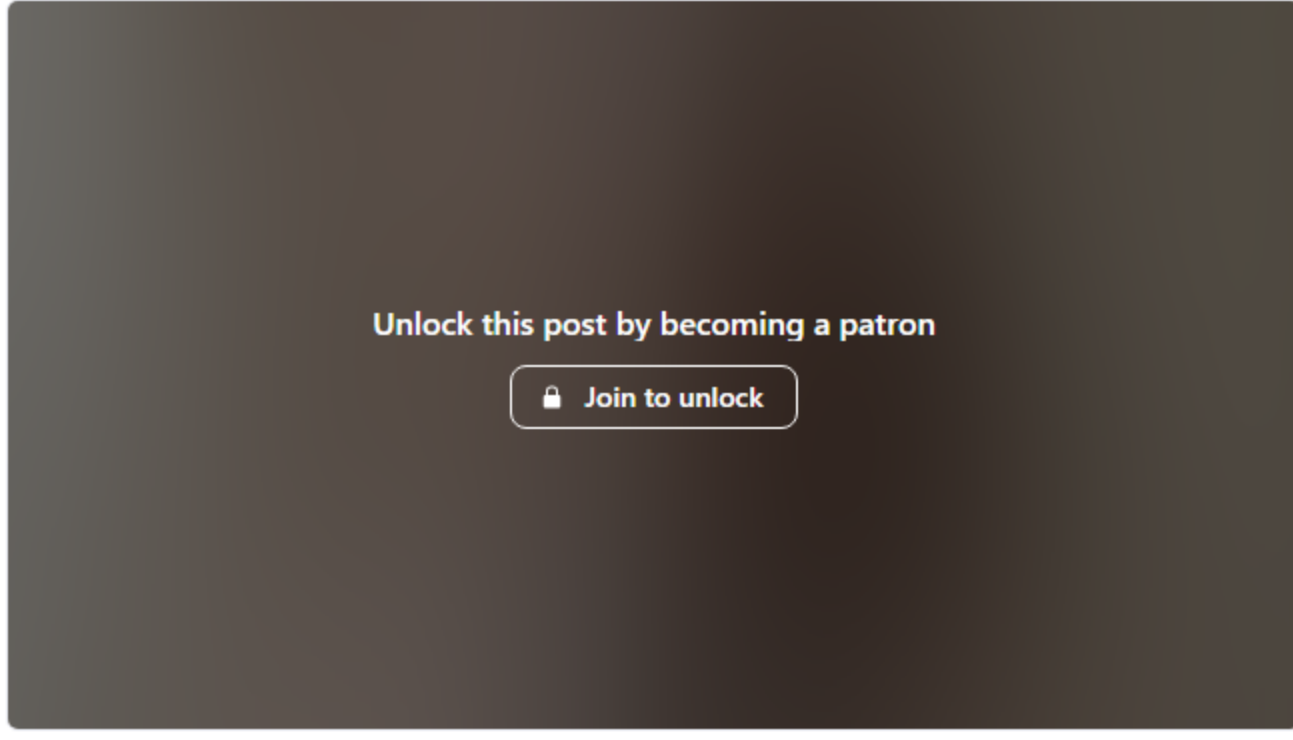
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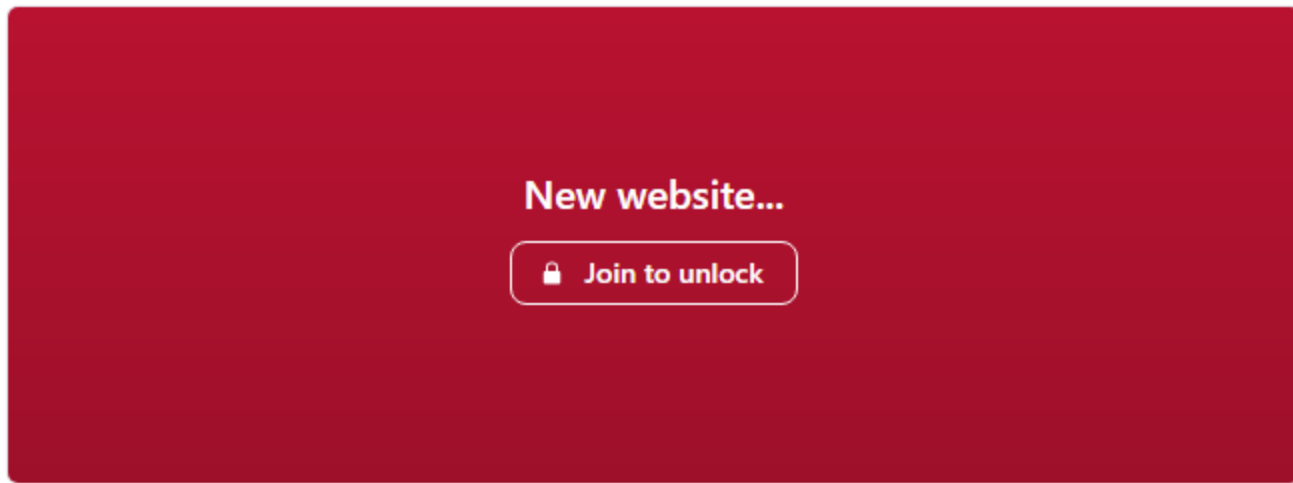
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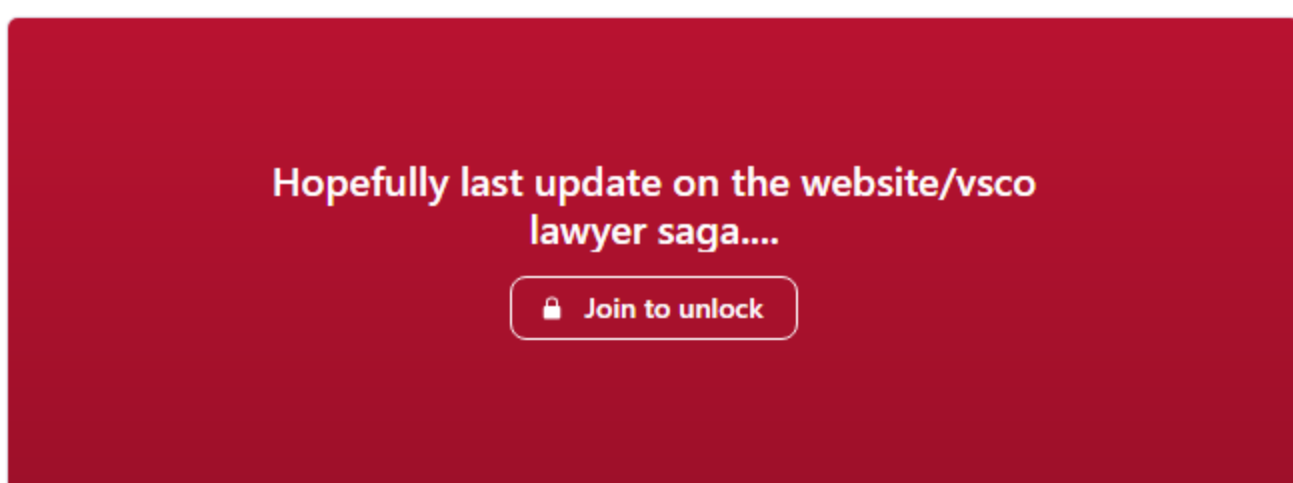
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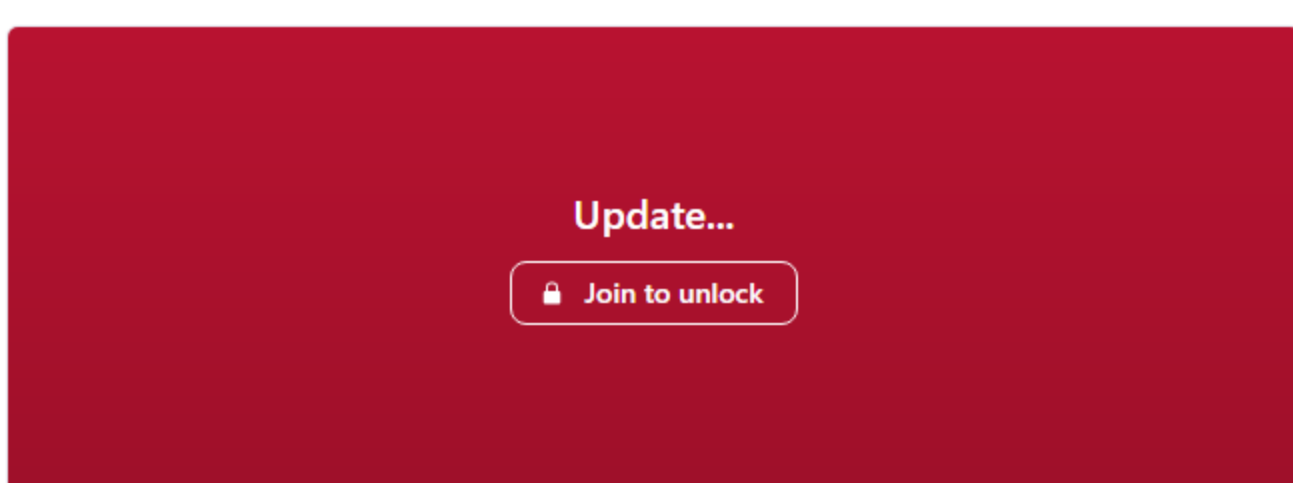
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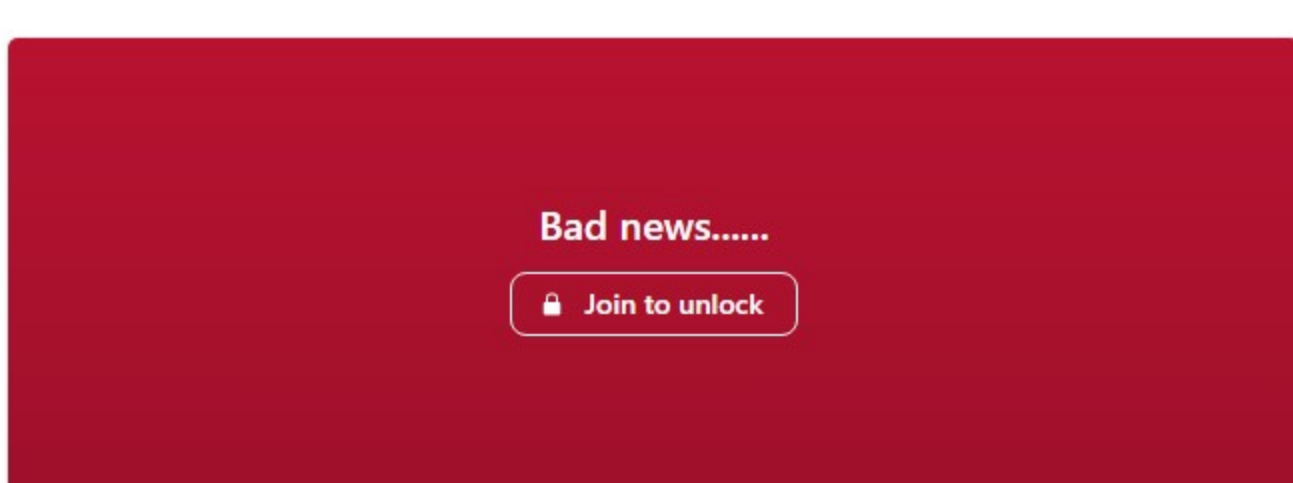
NEW WEBSITE!
New website...
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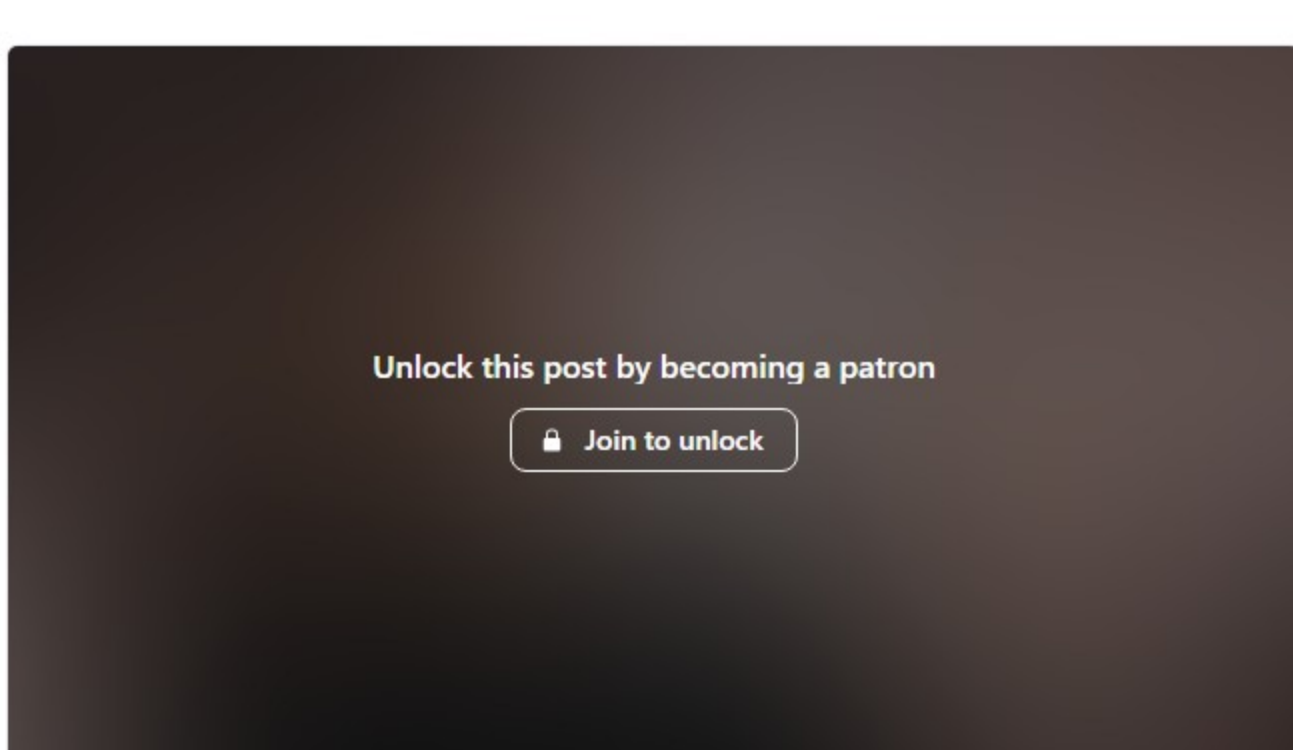
Hopefully last update on the website/vsco lawyer saga.
Hopefully last update on the website/vsco lawyer saga....
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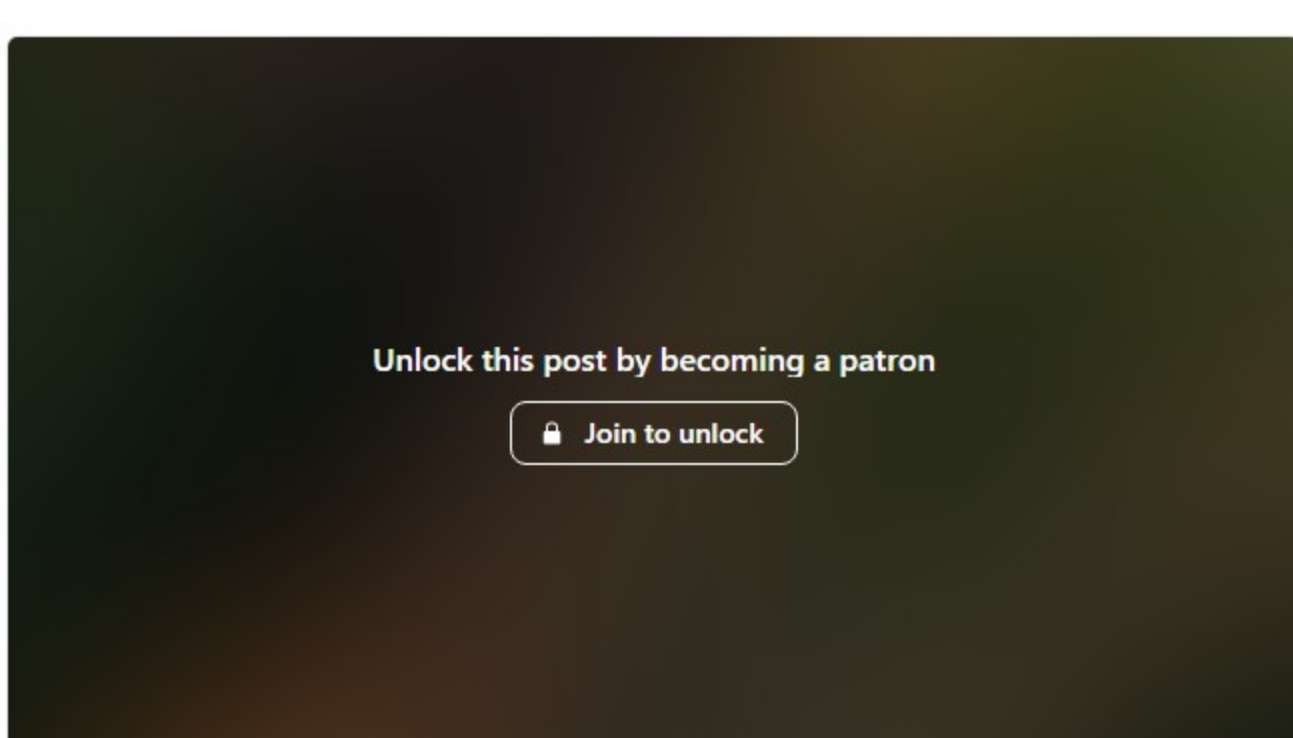
Update - website back up
Update...
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May 28 1 0



Very bad news
Bad news.....
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May 18 1 1



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marlena2188...
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Download HD fullsize VSCO media and profile photos and videos.

Glizzy Cafe is not affilaited with vsco.co in any way, shape, or form.

Deleted Users (Patreon)

Since this website costs a bit of money to run, I have a Patreon you can support the site with.

I will be posting 1-3 accounts per week that have been deleted.

If you want a user posted, I will also be taking requests.

<https://www.patreon.com/vsclub>



Privacy

Downloaded content is only logged to perform the basic functions of the website. No images are hosted on GlizzyCafe. To have an image removed, delete it from VSCO.

Feel free to securely email me at: <https://mailhide.io/en/e/6tllJfuc>

Donate

I run this website at a loss. I don't want to ruin the user experience with a ton of ads and shit like that. If you would like to help pay for the server costs:

BTC: bc1qhhlxrhfjyh7f4xchwzm8u7h70gwsqa87d4hcse

ETH: 0x9D2C5e9EbaF4d0C420ccCf7ae6198dBF08B1989C

XRP: rMS2ktbiyV8RfNNQqyaentxHqPntwk1LrQ

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DOGE: DGbmfdKxTJnhnG1kx2e4ARazER1AWCY7NQ

LTC: LQFMQZTn79Q6YLGNJof1JbmkBxrNzhLqGJ

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 Popular

Crypto



1 Reply Share ...



EXHIBIT B

Jonathan Kleiman, BA, JD

Barrister and Solicitor
1235 Bay Street, Suite 700
Toronto, ON M5R 3K5

1-855-416-0-416

Jonathan@JKleiman.com
<http://www.JKleiman.com/>

October 9, 2024

Sent by Email (zachary.alinder@kirkland.com)

WITH PREJUDICE

Zachary J. Alinder
Kirkland & Ellis LLP
555 California Street
San Francisco, CA 94104
United States

Dear Mr. Alinder,

Re: Response to Cease and Desist Letter Dated October 4, 2024

I represent Mr. Adam Khimji in connection with your letter dated October 4, 2024, on behalf of Visual Supply Company ("VSCO"). Please direct all future correspondence regarding this matter to my attention.

Mr. Khimji categorically denies any involvement in the activities alleged in your letter. Prior to receiving your correspondence, he had no knowledge of the matters described therein.

To facilitate an amicable resolution, my client is willing to agree to refrain from any future contact or interaction with VSCO, its services, or its users' works. This agreement is made without any admission of liability or wrongdoing on his part. He also confirms that he does not possess any materials or content belonging to VSCO or its users, as alleged in your letter.

However, we challenge the sufficiency and validity of the evidence upon which these allegations are based. The websites listed in your correspondence, which you allege are under my client's control, are currently non-operational and do not load. Furthermore, they bear no resemblance to the screenshots provided in your letter. The letter also makes vague references to "other owners" and "other websites" without providing specifics or evidence to support these claims. My client has no connection to the activities described, and we request that any such claims be substantiated before they are pursued further.

There are no direct ties between Mr. Khimji and the alleged activities, nor is there any history suggesting involvement in such matters. This further reinforces our position that these claims are unfounded. As for your demands for compensation, including investigative and legal expenses, my client respectfully declines as he is not responsible for the actions described and had no awareness of this situation until receiving your letter.

We also note that your letter sets an unreasonably tight deadline of October 14, 2024. The aggressive nature of this demand is not conducive to a fair resolution and raises concerns that undue pressure is being applied.

Jonathan Kleiman, BA, JD

Barrister and Solicitor
1235 Bay Street, Suite 700
Toronto, ON M5R 3K5

1-855-416-0-416
Jonathan@JKleiman.com
<http://www.JKleiman.com/>

We request an extension of this deadline to allow for a thorough review of the evidence and a reasoned response.

In light of the seriousness of these allegations, we again request that you provide any evidence or information that led you to associate Mr. Khimji with the alleged activities. This will allow us to address any misunderstandings or instances of mistaken identity. We trust that this response addresses your concerns and that no further action will be necessary. We respectfully request written confirmation that, upon receipt of this letter, VSCO considers this matter fully resolved and releases Mr. Khimji from any further claims or actions related to this issue.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Kleiman', with a stylized flourish at the end.

Jonathan Kleiman, BA, JD

EXHIBIT C

From: Jonathan Kleiman jonathan@jkleiman.com
Subject: Fwd: Response to Cease and Desist Letter Dated October 4, 2024
Date: October 11, 2024 at 5:51 PM
To: Adam Khimji akhimji3@uwo.ca

See below

Jonathan Kleiman, BA, JD

1235 Bay St., Suite 700
Toronto, ON, M5R 3K4

O: 1-855-416-0416
F: 647-977-5770
M: 416-554-1639
E: Jonathan@JKleiman.com
W: www.JKleiman.com

I appreciate your reviews: <https://g.page/kleimanlaw/review?rc>

IMPORTANT NOTICE:

Funds transfer fraud is on the rise. Please note, we will never email you with a request to change or update any banking or transfer information. If you receive a request like that by email, please phone us immediately using a previously known number. In addition, if we receive any banking or transfer information from you, we will confirm this by independent means. If you have questions or concerns, please contact us at 416-554-1639.

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----- Forwarded message -----

From: Alinder, Zachary J. <zalinder@sideman.com>
Date: Fri, Oct 11, 2024 at 7:32 PM
Subject: RE: Response to Cease and Desist Letter Dated October 4, 2024
To: Jonathan Kleiman <jonathan@jkleiman.com>
Cc: Portnoy, Erica Brand <eportnoy@sideman.com>, Levad, Andrew M. <alevad@sideman.com>

Dear Mr. Kleiman,

Your prompt response to VSCO's October 4, 2024 cease and desist and demand letter (the "C&D letter") is appreciated; however, Mr. Khimji's purported categorical denial of involvement with the identified websites and related unlawful conduct set forth in the C&D letter is extremely disappointing. The denial by Mr. Khimji appears to be motivated by a bad faith hope that VSCO does not have evidence to support its claims. That of course is not the case. CloudFlare identified Mr. Khimji as the owner/operator of the websites

identified in the C&D letter.

As a professional courtesy to you and in the interest of providing Mr. Khimji one final opportunity to come clean, attached are three of the documents provided by CloudFlare and authenticated by them pursuant to our subpoena, which establishes that Mr. Khimji is directly and personally involved in the operation of both websites specifically identified in the C&D letter -- vsco.club and glizzy.cafe.

I will reiterate that this is Mr. Khimji's final opportunity to come clean. Anything less than a full, frank, and honest response from Mr. Khimji will not be sufficient. Please confirm by close of business on Wednesday, October 16, 2024 that Mr. Khimji will comply with the nine listed demands set forth in the C&D letter.

In closing, please also note that your October 9, 2024 response letter has an incorrect email address, incorrect firm name, and incorrect physical address for me. I am a partner at Sideman & Bancroft LLP, not Kirkland & Ellis. Please make sure to update your records to ensure that there is no mistake in delivery of any correspondence regarding this matter in the future.

We look forward to hearing from you by Wednesday. VSCO continues to reserve all rights and remedies in relation to these matters.

Sincerely yours,
Zac Alinder

-----Original Message-----

From: Jonathan Kleiman <jonathan@jkleiman.com>

Sent: Wednesday, October 9, 2024 11:01 AM

To: Alinder, Zachary J. <zalinder@sideman.com>

Subject: Re: Response to Cease and Desist Letter Dated October 4, 2024

Mr. Alinder,

Please see the attached letter.

Thanks,

Jonathan Kleiman, BA, JD

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Toronto, ON, M5R 3K4

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vsco.club - Adam Khimji Payment Confirmation- Accounts.csv



glizzy.cafe - Prince of Wales Dr - Payment_Methods.csv

215 bytes



glizzy.cafe - Adam Khimji - Payment_Methods.csv

162 bytes

